

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

ROBERT ZEIDMAN

Case No. 0:23-cv-01433

PETITIONER,

v.

**DECLARATION OF
DAVID E. SCHLESINGER**

LINDELL MANAGEMENT LLC,

RESPONDENT.

I, David E. Schlesinger, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney with Nichols Kaster, PLLP. I am over the age of 18 and make this declaration upon my personal knowledge.

2. Attached as **Exhibit A** is a true and correct copy of the Prove Mike Wrong Challenge Official Rules.

3. Attached as **Exhibit B** is a true and correct copy of the Panel of Arbitrators Reasoned Decision and Final Award dated April 19, 2023.

4. Yesterday, May 18, 2023, Lindell Management LLC sent notice to counsel of a motion to vacate the award apparently filed in state court, Hennepin County District Court. The motion has not received a case number. As soon as that motion is docketed, Petitioner Zeidman intends to remove that action to federal court and seek to consolidate the actions.

5. Other than the material submitted to the court herewith and the notice of motion by Respondent dated May 18, 2023, there is no “notice, affidavit, or other paper

used upon an application to confirm, modify, or correct the award [or] copy of each order of the court upon such an application,” as referenced by 9 U.S.C. § 13.

6. As of the date of this declaration, Lindell Management LLC has not paid any portion of the \$5,000,000 awarded by the arbitration panel on April 19, 2023.

7. I declare under penalty of perjury that pursuant to the laws of the United States of America that the foregoing is true and correct.

DATED: May 19, 2023

NICHOLS KASTER, PLLP

/s/ David E. Schlesinger
David E. Schlesinger
Attorney for Petitioner Robert Zeidman